

1 PHILLIP A. TALBERT
2 United States Attorney
3 MATHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7
Oscar Gonzalez de Llano
4 Special Assistant United States Attorney
Social Security Administration
Office of General Counsel
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4818
Email: Oscar.Gonzalez@ssa.gov
5
6 Attorneys for Defendant
7
8
9
10
11
12
13

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JENNY ANN BURKS, o/b/o BAMAB
(Minor),

Plaintiff,

v.
Commissioner of Social Security,
Defendant.

No. 2:24-cv-02477-DMC

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended thirty-three (33) days from January 8, 2025, to February 10, 2025. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has and will be unable to devote the time required to complete its

1 response. Counsel has multiple merit briefs currently due in district court cases within the next
2 week. Counsel for Defendant was also out of the office for much of the previous couple weeks
3 including December 23rd – 26th and December 30th – January 1st due to planned holiday as well
4 as illness. Given upcoming competing workload requirements an extension until February 10,
5 2025, will provide the opportunity for the undersigned Counsel for Defendant to prioritize
6 completing the response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel
7 apologizes to the Court and Plaintiff's counsel for any inconvenience caused by this request and
8 delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

9

10 Respectfully submitted,

11

PHILLIP A. TALBERT
United States Attorney

12

DATE: January 7, 2025

13 By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
14 Special Assistant United States Attorney
Attorneys for Defendant

15

16

Respectfully submitted,

17

DATE: January 7, 2025

18 By: s/ Sherianne Laba *
SHERIANNE LABA, ESQ.
19 Osterhout Berger Daly
(*as authorized by email)
Attorney for Plaintiff

20

21

22

23

24

25

26

27

28

1
2 ORDER
3

4 Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an
5 extension, up to and including February 10, 2025, to respond to Plaintiff's Motion for Summary
6 Judgment.
7

8 Dated: January 8, 2025
9

10 
11 DENNIS M. COTA
12 UNITED STATES MAGISTRATE JUDGE
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28